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13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
14	SAN FRANCISCO DIVISION		
15	GOOGLE LLC,	Case No. 3:20-cv-06754-WHA	
16	Plaintiff,	Related to Case No. 3:21-cv-07559-WHA	
17	vs.	DECLARATION OF NIMA HEFAZI IN SUPPORT OF GOOGLE LLC'S	
18	SONOS, INC.,	ADMINISTRATIVE MOTION TO FILE	
19	Defendant.	UNDER SEAL PORTIONS OF ITS OPPOSITION TO SONOS'S MOTION TO	
20		STRIKE PORTIONS OF GOOGLE'S INVALIDITY AND	
21		NONINFRINGEMENT EXPERT REPORTS	
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01980-00181/13887067.1

I, Nima Hefazi, declare and state as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing Google LLC ("Google") in this matter. I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

- 2. I make this declaration in support of Google's Administrative Motion to File Under Seal Portions of its Opposition to Sonos's Motion to Strike Portions of Google's Noninfringement and Invalidity Expert Reports ("Opposition"). If called as a witness, I could and would testify competently to the information contained herein.
 - 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Opposition	Portions highlighted in yellow	Google
Exhibit 5 to the Declaration of Marc Kaplan ("Exhibit 5")	Portions outlined in red boxes	Google
Exhibit 8 to the Declaration of Marc Kaplan ("Exhibit 8")	Portions outlined in red boxes	Google
Exhibit 9 to the Declaration of Marc Kaplan ("Exhibit 9")	Portions outlined in red boxes	Google
Exhibit 10 to the Declaration of Marc Kaplan ("Exhibit 10")	Entire document	Google
Exhibit 13 to the Declaration of Marc Kaplan ("Exhibit 13")	Portions outlined in red boxes	Google
Exhibit 19 to the Declaration of Marc Kaplan ("Exhibit 19")	Portions outlined in red boxes	Google
Exhibit 20 to the Declaration of Marc Kaplan ("Exhibit 20")	Portions outlined in red boxes	Google
Exhibit 21 to the Declaration of Marc Kaplan ("Exhibit 21")	Portions outlined in red boxes	Google
Exhibit 22 to the Declaration of Marc Kaplan ("Exhibit 22")	Portions outlined in red boxes	Google
Exhibit 24 to the Declaration of Marc Kaplan ("Exhibit 24")	Portions outlined in red boxes	Google
Exhibit 25 to the Declaration of Marc Kaplan ("Exhibit 25")	Entire document	Google

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1	4. The portions of Google's Opposition highlighted in yellow, the portions of Exhibits 5,
2	8, 9, 13, 19, 20, 21, 22, and 24 outlined in red boxes, and Exhibits 10 and 25 contain references to
3	Google's confidential business information and trade secrets, including details regarding architecture
4	and technical operation of Google's products and functionalities that Sonos accuses of infringement,
5	that Google contends is prior art, and/or that are currently under development and have not yet been
6	released. The specifics of how these functionalities operate is confidential information that Google
7	does not share publicly. Thus, public disclosure of such information could lead to competitive harm
8	to Google as competitors could use these details regarding the architecture and functionality of
9	Google's products to gain a competitive advantage in the marketplace with respect to their competing
10	products. Google has therefore designated this information as HIGHLY CONFIDENTIAL—
11	ATTORNEYS' EYES ONLY under the protective order (Dkt. No. 92). I also understand that a less
12	restrictive alternative than sealing these documents would not be sufficient because the information
13	sought to be sealed is Google's confidential business information and trade secrets but is necessary to
14	Google's Opposition.
15	I declare under penalty of perjury under the laws of the United States of America that to the
16	best of my knowledge the foregoing is true and correct. Executed on February 10, 2023, in Los
17	Angeles, California.
18	DATED: February 10, 2023
19	By: /s/ Nima Hefazi
20	Nima Hefazi
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ATTESTATION I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing. DATED: February 10, 2023 /s/ Charles K. Verhoeven Charles K. Verhoeven

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